

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re:

Scott Matthew Huggins

Debtor(s).

Case No. 23-00184-eg

Chapter 13

**NOTICE OF FILING OBJECTION TO THE CLAIMS OF LOUISE GRANT
CLAIM NO 6**

Scott Matthew Huggins filed an Objection to Proof of Claim #6 filed on March 15, 2023 by Louise Grant seeking to disallow the claim. A copy of the Objection and proposed order accompany this notice.

Your claim may be reduced, modified, or eliminated. You should read these papers carefully and discuss them with your attorney, if you have one.

If you do not want the court to eliminate or change your claim, then on or before 30 days from April 25, 2023, you or your attorney must:

File with the court a written response to the objection explaining your position at:

U.S. Bankruptcy Courthouse
J. Bratton Davis
1100 Laurel Street
Columbia, SC 29201

Responses, returns, or objections filed by an attorney must be electronically filed in ecf.scb.uscourts.gov.

If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before the date stated above.

You must also send to:

Sean Markham
P.O. Box 101
Mount Pleasant, SC 29465-0101

AND

James M. Wyman,
Chapter 13 Trustee
PO Box 997
Mt. Pleasant, SC 29465-0997

If an objection is filed, **then a hearing will be held on June 22, 2022, at 10:30 a.m.** at the United States Bankruptcy Court, **145 King Street, Room 225, Charleston, South Carolina, 29401.**

If you or your attorney do not take these steps, the court may decide that you do not oppose the objection to claim.

Markham Law Firm, LLC

Date of Service: April 25, 2023

/s/Sean Markham

Sean Markham, I.D. # 10145

Attorney for Scott Matthew Huggins

P.O. Box 101

Mount Pleasant, SC 29465-0101

Tel: 843-284-3646

sean@markhamlawsc.com

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OBJECTION TO CLAIM

Scott Matthew Huggins (“Movant”) hereby objects to the claim of Louise Grant, on the following grounds:

1. This Court has jurisdiction of this proceeding under 28 U.S.C. §157(b)(2)(G).
2. Debtor filed for relief under Chapter 13 of the U.S. Bankruptcy Code on January 19, 2023.
3. Movant is the Debtor(s) in the above captioned case.
4. Louise Grant, through counsel, filed proof of claim 6 on March 15, 2022 in the amount of \$234,000.
5. The claim seeks recovery for matters which are presently being litigated and have yet to be resolved.
6. The matters giving rise to any claim that Louise Grant may have against Defendant are presently being litigated before this court in Adversary Proceeding Number 23-80013-eg.
7. At a minimum this claim is unliquidated and should not be established as a valid claim in any amount until the conclusion of the pending adversary.
8. Further, the claim asserts that the claim is secured but Louise Grant has no established or existing security interest in any of the Debtor’s property and is not a secured claim.
9. Debtor would assert that this claim should be modified to an unliquidated claim and would request that an order be entered establishing this claim as unliquidated and to allow Louise Grant to modify her claim at a later date should an amount be established as

due and owing by the Debtor to Ms. Grant as part of the pending adversary litigation.

WHEREFORE, Debtor requests that this court modify Claim # 6 to an unliquidated amount, allow Louise Grant to modify her claim in the event she is awarded a damages amount in the ongoing adversary litigation, and to award any additional relief as the Court may deem proper.

Markham Law Firm, LLC

Date of Service: April 25, 2023

/s/Sean Markham
Sean Markham, I.D. # {{contact|20611}}
Attorney for Scott Matthew Huggins
P.O. Box 101
Mount Pleasant, SC 29465-0101
Tel: 843-284-3646
sean@markhamlawsc.com

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I, Sean Markham, an attorney with the Markham Law Firm, LLC, do hereby certify that a copy of the Objection to Claim(s) were mailed to the parties below.

J. Ronald Jones, Jr.
Smith Debnam Narron Drake
Saintsing & Myers, LLP
P. O. Box 22795
Charleston, SC 29413

Louise Grant
89 America St,
Charleston, SC 29403

Date of Service: April 25, 2023

Markham Law Firm, LLC

/s/Sean Markham
Sean Markham, I.D. # 10145
Attorney for Scott Matthew Huggins
P.O. Box 101
Mount Pleasant, SC 29465-0101
Tel: 843-284-3646
sean@markhamlawsc.com